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June 12, 2018

Honorable Paul S. Diamond
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
U.S. Courthouse
601 Market Street
Room 6613
Philadelphia, PA 19106

RE: JOHN DOE v. ST. JOSEPH'S UNIVERSITY and JANE ROE
USDC - EASTERN, No. 2:18-cv-02044

Dear Judge Diamond:

Today I was retained to represent Defendant Jane Roe in the above referenced matter. This afternoon, I learned that Plaintiff has already been deposed and there are a number of additional depositions scheduled, including one as early as tomorrow afternoon. I have contacted counsel requesting that the deposition tomorrow be adjourned. Counsel for St. Joseph's University does not object to the adjournment request. I have not yet heard from Plaintiff's counsel in this regard.

A review of the docket indicates that the Complaint in this matter was filed on May 15, 2018, and my client was served on May 25, 2018. My client's answer is not due until June 15, 2018. Further, I note that no Rule 26 conference has yet taken place. At this time, I have nothing other than the Complaint and the TRO papers. It is my understanding that tomorrow's deposition is of the attorney retained by St. Joseph's University to conduct its investigation. I have no documents regarding the investigation, and have not had an opportunity to so much as read the lengthy Complaint in its entirety, let alone meet with my client in person to discuss this matter. Without this most basic information, I am unable to competently represent my client's interests at a deposition. Further, it is my understanding that the deposition of Plaintiff has already taken place before counsel entered for Jane Roe.

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I am respectfully requesting a call with the Court and all counsel to discuss adjourning the depositions that were scheduled before we entered into the case, having a Rule 26 Conference to discuss discovery in this matter, and permitting a second deposition of Plaintiff once meaningful discovery has been exchanged.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Susan R. Engle

SUSAN R. ENGLE

SRE/ns

cc: Edward J. Schwabenland, Esquire
John M. Myers, Esquire